

### Remarks

No claims have been allowed. The following claims were rejected under 35USC103 as being anticipated:

- Claims 1-3 by Russo in view of Vartarian;
- Claims 4 and 7 by Russo and Vartarian in view of Gary;
- Claim 5 by Russo and Vartarian in view of Howard;
- Claim 8 by Russo, Vartarian and Gary in view of Howard;
- Claim 6 by Russo, Vartarian and Howard in view of Anderle;
- Claim 9 by Russo, Vartarian, Gary and Howard in view of Anderle.

As indicated in Applicant's specification, the problem of thoroughly and safely cleaning mini blinds has been lacking an effective solution, at least for the ordinary user, for a very long time. While many cleaning tools have been marketed, none enabled a user to safely and thoroughly clean a mini blind with soap and water, as can be done with the system of the present invention. The structural supporting elements of the invention are specifically designed to safely support the mini blind in a water-friendly environment (shower, bath tub, outside areas with smooth attachment surfaces).

The Russo, Gary and Howard patents are directed to suction cup attachment devices for shelf supports, towel racks and the like whereas the Vartanian and Anderle patents are directed to blinds. None of the applied art discloses or suggests its use in cleaning mini blinds. *Indeed, the most pertinent art is the Madsen patent (previously applied by the Examiner) and the Mink and Malcolm patents, all of which are specifically directed to the problem of cleaning mini blinds.*

It is respectfully suggested that these patents show that the cleaning of Venetian blind structures has achieved a separate status in the art and further, that the complicated and expensive structures disclosed in the patents provide clear and convincing proof of the unobviousness of Applicant's simple system for cleaning mini blinds.

The Russo patent discloses a roll up window shade or display that is secured to a flat surface by means of suction-cup-attached end pieces for engaging the opposite ends of a conventional window shade roller. Russo's end brackets 18,19 include octagon shaped bracket element holders 22,23 for securing mating insert elements 24,25 that respectively include a hole 14 and slot 15 for securing the pin and tang ends of a conventional window shade roller support. *The patent doesn't mention or suggest anything relative to cleaning of the display or window shade.* It is also clear that the Russo structure cannot be used to support the spine ends of a mini blind.

The Vartanian patent discloses a standard mini blind mounting arrangement with the mini blind having specially configured slats to enable the use of readily removable decorative patterns for display purposes. The patent background describes the prior art as including mini blinds (with conventional slats) that have removable decorative covers for use in a consumer's home. Here again, there is no mention of the task of cleaning of the blind.

The Gary patent discloses a triangular shaped double suction cup supported hook holder arrangement for securing relatively heavy objects close to a support surface. There is nothing in the patent about mini blind cleaning.

The Howard patent discloses a cantilevered arrangement for helping secure a suction cup when the load is applied. There is nothing in the patent about cleaning of a mini blind.

The Anderle patent discloses adjustable cornice installation and mounting brackets.

The new rejections of Applicant's claims are all silent regarding the critical inventive concept, namely that of providing a combination of elements to facilitate the cleaning of mini blinds.

In an effort to further distinguish Applicant's invention over the art (without negatively impacting the scope of her invention), the claims have been amended to specify the matching configurations of the mini blind spine and Applicant's structural supports. Any combination of Russo and Vartanian would thus require changes in Russo's brackets and further militate against such combination. Most importantly it is respectfully submitted that, without Applicant's inventive concept, the combination of Russo and Vartanian would not occur to one of ordinary skill in the art of mini blind cleaning-as clearly exemplified by the above-noted Madsen, Mink and Malcolm patents.

Certainly, suction cup-secured supports have been around for ages (Thomas-1925; Walters-1983;) as have various complicated and expensive arrangements for supporting mini blinds for cleaning (Madsen-1958; Mink-1990; Malcolm-1998). (**Note that Madsen even discloses suction cup holders for his mini blind stand!**) However, to Applicant's knowledge, no one conceived of anything similar to her simple, low cost invention, much less made it available to the public, before her invention thereof.

Specifically, claims 1-3 are believed to be unobvious over the Russo and Vartanian patents for the reasons above.

The other rejections all include the basic references, Russo and Vartanian and do not add anything of relevance to the art of mini blind cleaning. In rejecting claims 4 and 7 the Examiner combined Gary (a pair of suction cups) with Russo and Vartanian. In view of the argument above, the rejections on obviousness are not believed to be sustainable.

The Examiner' rejection of dependent claim 5 on Russo, Vartanian and Howard (an intermediate support) is likewise not believed to be sustainable in view of the above arguments.

Dependent claim 6's rejection based upon Russo, Vartanian, Howard and Anderle (alignment indicia) is similarly not believed to well grounded.

Dependent claim 8's rejection on Russo, Vartanian, Gary and Howard and dependent claim 9's rejection on these references plus Anderle are also not believed to be sustainable in view of the above arguments.

Applicant's invention provides the ordinary user with a very practical solution to a long-standing problem. One can certainly argue "til the cows come home" as to whether Applicant's invention is or is not obvious by analyzing the art and speculating as to what a person of ordinary skill in that art would have done at the time. The task is often especially difficult where, as here, the invention is very simple. **Fortunately in this case, there is no need for such speculation because the invention has, in fact, been commercialized and the four-year history of that commercialization provides convincing proof of its unobviousness to those of ordinary skill in the art.**

In support of her proposition that the invention is not obvious, Applicant is submitting another Declaration updating the remarkable progress achieved in commercializing the invention. The facts in the Declaration substantiate the significant and rapidly growing success of the invention in the marketplace, especially in view of the very limited resources available for commercialization. To summarize, sales approximated:

\$19,000 on 2,324 product units in 2002;  
\$51,000 on 6,184 product units in 2003;  
\$107,000 on 11,095 product units in 2004; and  
\$402,000 on 59,846 product units (so far) in 2005.

It is respectfully submitted that this rapidly accelerating growth trend is eloquent testimony to a long-felt need in the art for the invention. The Examiner is urged to give serious consideration to this evidence in her further deliberations.

With this amendment, the application is believed to be in allowable condition and reconsideration and allowance thereof are respectfully requested. Should the Examiner have any question concerning the amendment or the application, she is respectfully invited to contact the undersigned attorney by telephone.

Respectfully submitted



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